

UNITED STATES DISTRICT COURT

for the

Western District of Wisconsin

Civil Division

MICHELLE R GILBANK, et al.,

Plaintiffs,

vs.

WOOD COUNTY DHS, et al.,

Defendants.

Case No.: 20-CV-601-JDP

PLAINTIFF'S MOTION FOR SUMMARY  
JUDGEMENT

Plaintiffs seek the Court's partial summary judgment on five causes:

- (1) that the warrantless removal of the minor child T.E.H. from Plaintiff's custody on August 21, 2018,
- (2) the warrantless eviction of Plaintiff on August 21, 2018, and
- (3) the continued interference in Plaintiff's custody of T.E.H. was a violation of Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights of familial association and interest in being secure in her home,
- (4) Plaintiff's right to procedural due process, and
- (5) Plaintiff's right to substantive due process.

This motion is based on the Proposed Findings of Fact and Plaintiff's Supporting Brief and all other declarations and exhibits submitted therewith on July 1, 2021.

PLAINTIFF'S MOTION FOR SUMMARY JUDGEMENT - 1

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2 Thank you.

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4 Dated at Marshfield, Wisconsin, this 1<sup>st</sup> day of August, 2021.

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6 *Michelle R. Gilbank*

7 Michelle R. Gilbank, pro se  
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